

HELBRAUN || LEVEY

September 14, 2021

**VIA ECF**

The Hon. Edgardo Ramos  
United States District Court for the Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Moreno-Baez v. Snack Company, LLC, et al.*  
Civil Action No.: 14-cv-6914

The application is  granted  
 denied



Edgardo Ramos, U.S.D.J  
Dated: 09/15/2021  
New York, New York

Your Honor:

My office has just been re-engaged by Defendants Snack Company, LLC, d/b/a Snack; Snack Company Bedford LLC d/b/a Snack Taverna; and Adam Greene in the above referenced matter. While my office may have previously represented these parties prior to 2016, the attorneys working on that matter are no longer with my firm. This matter is new to me and as such, I ask the Court to adjourn all dates related to pending Order to Show Cause, seeking default judgment against the Defendants for a period of thirty (30) days. I have already spoken with opposing counsel, John M. Gurrieri, Esq., and he consents to this request.

The basis for this request is multifaceted. First, the present return date falls on Yom Kippur and as such, I will be unable to attend the hearing either in-person or virtually. Second, as I have been recently engaged by my clients, an extension of time is necessary for me to review the file and discuss with my clients their respective positions so that I can adequately respond to the pending Order to Show Cause. Third, an extension of time will allow the parties to continue their renewed and ongoing settlement discussions. I am happy to report that the parties have engaged in very fruitful and encouraging settlement discussions today and are close to settling this matter.

Specifically, we ask that the Court to adjourn Defendants' time to respond to the pending Order to Show Cause until October 8, 2021, the time for Plaintiff to reply until October 15, 2021, and the return date for the hearing until anytime thereafter convenient for the Court. No other dates or deadlines have yet been set by the Court.

Thank you for your consideration.

Respectfully submitted,

  
Lee N. Jacobs